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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 15-371 JST
)	
Plaintiff,)	STIPULATION AND
)	
v.)	[PROPOSED]
)	
JOSE LUIS RUIZ MALDONADO, and)	ORDER EXCLUDING TIME
HUBER RUIZ MALDONADO,)	
)	
Defendants.)	

On March 11, 2016, the government and defendants Jose Luis Ruiz Maldonado and Huber Ruiz Maldonado appeared through counsel in this matter. The parties informed the Court that they are discussing terms of resolution but have not yet reached agreement. Accordingly, the Court set the case for trial on August 22, 2016. The defendants also indicated that they may have substantive motions (not including motions in limine). The Court agreed to hear any such motions on July 8, 2016 at 1:30 p.m. in Oakland. The Court further directed the parties to agree on a briefing schedule. The parties have met and conferred and have agreed to the following briefing schedule: Defendants will file their motions on or before May 27, 2016; the government will respond on or before June 10, 2016; the defendants will reply on or before June 24, 2016. The parties agreed that the defendants need time to prepare their motions, to prepare for trial, and to continue discussions regarding resolution. Accordingly, the parties

STIPULATION AND ORDER EXCLUDING TIME
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1 agreed that time should be excluded between March 11, 2016, and August 22, 2016, in order to allow for
2 the effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv).

3 The parties agree that the ends of justice served by granting the continuance outweigh the best
4 interest of the public and the defendant in a speedy trial.

5 DATED: March 16, 2016

Respectfully submitted,

6 BRIAN J. STRETCH
Acting United States Attorney

7
8 /s/
FRANK J. RIEBLI
9 Assistant United States Attorney

10 /s/ Frank Riebli w/ permission
11 LINDA FULLERTON
12 Attorney for Jose Luis Ruiz
Maldonado

13 /s/ Frank Riebli w/ permission
14 SCOTT SUGARMAN
15 Attorney for Huber Ruiz Maldonado

16 For the reasons stated above, the Court finds that the exclusion of time from March 11, 2016
17 through and including August 22, 2016 is warranted and that the ends of justice served by the
18 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
19 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendants effective
20 preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv). The
21 Court also directs the defendants to file any substantive motions on or before May 27, 2016. The
22 government is to respond on or before June 10, 2016, and the defendants will reply by June 24, 2016.
23 SO ORDERED.

24 DATED: March 21, 2016

25 
HONORABLE JON S. TIGAR
United States District Judge